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10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 SOUTHERN DIVISION

14 UNITED STATES OF AMERICA

15 Plaintiff,

16 vs.

17 Defendants,

18 KREG M. EACRET; DEBRA S. HARRIS;
19 WELL'S FARGO HOME MORTGAGE., INC.,
20 successor-in-interest to World Savings Bank;
21 ASSET ACCEPTANCE LLC.

22 Case No. CASE NO. 8:18CV-00860-DOC-
23 AFM

24 **ANSWER OF KREG M. EACRET TO
THE SECOND AMENDED
COMPLAINT TO REDUCE FEDERAL
INCOME TAX ASSESSMENTS TO
JUDGMENT AND TO FORECLOSE
FEDERAL TAX LIENS AGAINST REAL
PROPERTY.**

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26 DEFENDANT KREG EACRET'S AMENDED ANSWER

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28 1 – 20. Defendant Kreg Eacret reasserts and realleges the allegations, denials and defenses
raised in Paragraphs 1 through 20 of his original answer to the second amended complaint to reduce
federal income tax assessments to judgment and to foreclose federal tax liens against real property
(the "Original Answer").

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30 21. On or about October 15, 2004, defendant Kreg Eacret filed or caused to be filed his individual
income tax return on Form 1040 for the year 2003.

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32 22. On or about October 15, 2005, defendant Kreg Eacret filed or caused to be filed his individual

1 income tax return on Form 1040 for the year 2004.

2 23. On or about October 15, 2006, defendant Kreg Eacret filed or caused to be filed his individual
3 income tax return on Form 1040 for the year 2005.

4 24. On or about October 15, 2007, defendant Kreg Eacret filed or caused to be filed his individual
5 income tax return on Form 1040 for the year 2006.

6 25. Upon information and belief, plaintiff United States through the Internal Revenue Service failed
7 to issue to defendant Kreg Eacret a notice of deficiency by October 15, 2007 for the year 2003.

8 26. Upon information and belief, plaintiff United States through the Internal Revenue Service failed
9 to issue to defendant Kreg Eacret a notice of deficiency by October 15, 2008 for the year 2004.

10 27. Upon information and belief, plaintiff United States through the Internal Revenue Service failed
11 to issue to defendant Kreg Eacret a notice of deficiency by October 15, 2009 for the year 2005.

12 28. Upon information and belief, plaintiff United States through the Internal Revenue Service failed
13 to issue to defendant Kreg Eacret a notice of deficiency by October 15, 2010 for the year 2006.

14 27. Upon information and belief, the assessment and collection of the alleged deficiencies against
15 defendant Kreg Eacret for the years 2003, 2004, 2005 and 2006 is barred by limitations.

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21 Respectfully Submitted,

22 /s/
23 Michael E. Shaff
24 Counsel for defendant Kreg M. Eacret
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